

EXHIBIT 2

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Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING, LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER
LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
limited liability company; J&K
LAKEWOOD, LLC, a California limited
liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
California, limited liability company; GK
CERRITOS, LLC, a California, limited
liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**DECLARATION OF DAVID
GROSSMAN**

Complaint Filed: May 31, 2024
Trial Date: August 18, 2025

1 GK CAPITAL GROUP, LLC, a California
2 limited liability company and DOES 1
through 100, inclusive,

3 Defendants.

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5 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
6 Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
7 California limited liability company; GK
CAPITAL GROUP, LLC, a California
8 limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

9 Counter-Claimants,

10 v.

11 SHAKEY'S PIZZA ASIA VENTURES,
12 INC, a Philippines corporation,

13 Counter Defendant.

14
15 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
16 Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
17 California limited liability company; GK
CAPITAL GROUP, LLC, a California
18 limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
company; and GUY KOREN, an individual,

19
20 Third Party Plaintiffs,

21 v.

22 PC INTERNATIONAL PTE LTD., a
Singapore business entity; SPAVI
23 INTERNATIONAL USA, INC., a California
corporation; CINCO CORPORATION, a
24 Philippines corporation; and ROES 1 through
10, inclusive,

25 Third Party Defendants.
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DECLARATION OF DAVID GROSSMAN

I, David Grossman, declare as follows:

1. I am a partner at Loeb & Loeb LLP. I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would testify competently thereto.

2. I have been a practicing litigator for twenty-five years and I have known Todd Malynn since the time I was a summer associate in law school. I practiced with Mr. Malynn when he was a litigator at Loeb & Loeb, approximately twenty years ago. I worked in the same department with Mr. Malynn for several years and am familiar with his cases and his practice during that time period.

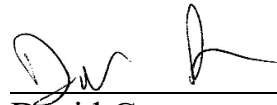
3. Mr. Malynn is extremely hard-working and intelligent and has a zeal for the practice of law that, in my experience, is virtually unrivaled. After several years working together, Mr. Malynn left my firm and started the Los Angeles office of an out-of-state firm. In the years that he has been gone, I have referred a number of matters to him.

4. Notably, six or seven years ago, I referred a matter to Mr. Malynn that was very difficult due to the intransigence of the opposing party – who had been taking advantage of my client for years, by refusing to distribute funds from a jointly-owned real estate company. In that matter, the opposing party had a pattern and practice of litigating to exhaust the opposition. By the time Mr. Malynn took over the case, it had been pending for several years, and yet Mr. Malynn was able to overcome a motion to enforce a settlement, and he thereafter set the case on the correct course, and after a new judge was appointed, she set a trial on the merits and ruled entirely in favor of our client.

5. This positive result was largely due to Mr. Malynn's outstanding work on the case, and his ability to navigate difficult and complex legal and procedural issues.

1 6. In my experience, Mr. Malynn has always treated his colleagues, co-
2 counsel and opposing counsel with professionalism and good faith. I continue to
3 refer matters to him, as I know that he will provide clients with the utmost attention
4 and diligence.

5 I declare under penalty of perjury that the foregoing is true and correct.
6 Executed August 4, 2025, within the United States, its territories, possessions, or
7 commonwealths.

8
9 
10 David Grossman